

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
	:	_____ 31 U.S.C. § 5332(a)(1)
ROBERT GROVE	:	(bulk cash smuggling - 1 count)
_____	:	_____ 31 U.S.C. § 5316(a),(b)
	:	(failure to file report regarding monetary
	:	instrument - 1 count)
	:	18 U.S.C. § 1001(a)(2)
	:	(false statements - 1 count)
	:	31 U.S.C. § 5317(c) (criminal forfeiture)

INDICTMENT

COUNT ONE

(Bulk Cash Smuggling)

THE GRAND JURY CHARGES THAT:

On or about March 26, 2007, at Philadelphia International Airport, in the Eastern District of Pennsylvania, defendant

ROBERT GROVE

knowingly concealed, with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, specifically FinCEN Form 105, also known as Customs Form 4790 (Report of International Transportation of Currency or Monetary Instruments), more than \$10,000 in United States currency, that is, approximately \$49,453, on his person and in his luggage, merchandise and other containers, and attempted to transport this currency from a place outside the United States to a place in the United States.

In violation of Title 31, United States Code, Section 5332(a)(1).

COUNT TWO

(Failure to File Report Regarding Monetary Instrument)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2007, at Philadelphia International Airport, in the Eastern District of Pennsylvania, defendant

ROBERT GROVE

knowingly and willfully failed to file an accurate report as required by and described in Title 31, United States Code, Section 5316(b), specifically FinCEN Form 105, also known as Customs Form 4790 (Report of International Transportation of Currency or Monetary Instruments), in that he falsely claimed that he was not transporting currency and monetary instruments with a total value of over \$10,000, when in fact he was knowingly transporting, and about to transport, monetary instruments of more than \$10,000 at one time, that is, approximately \$49,453 in United States currency, from a place outside the United States to a place in the United States.

In violation of Title 31, United States Code, Sections 5316(a)(1)(B), 5316(b) and 5322.

COUNT THREE

(False Statements)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2007, at Philadelphia International Airport, in the Eastern District of Pennsylvania, defendant

ROBERT GROVE

knowingly and willfully made a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the United States Department of Homeland Security, Customs and Border Protection, a department in the executive branch of the United States government, in that the defendant stated and represented to agents of this department that he was not transporting currency and monetary instruments with a total value of over \$10,000, when, as defendant knew, he was transporting, and about to transport, more than \$10,000 in United States currency, that is, approximately \$49,453 in United States currency.

In violation of Title 18, United States Code, Section 1001(a)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 31, United States Code, Sections 5332(a)(1), 5316(a)(1)(B), 5316(b) and 5322, defendant

ROBERT GROVE

shall forfeit to the United States any property, real or personal, involved in the offense, and any property traceable to such property, including, but not limited to, the \$49,453 in United States currency seized from the defendant's person and baggage on or about March 26, 2007, at Philadelphia International Airport.

All pursuant to Title 31, United States Code, Sections 5317(c) & 5332(b).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY